

U.S. Department of Justice  
Washington, DC 20530

OMB NO. 1124-0002; Expires February 28, 2014

**Supplemental Statement**

**Pursuant to the Foreign Agents Registration Act of  
1938, as amended**

For Six Month Period Ending 10/31/12

(Insert date)

**I - REGISTRANT**

1. (a) Name of Registrant

(b) Registration No.

Venable LLP

5931

(c) Business Address(es) of Registrant

575 7th Street, NW  
Washington DC, 20004

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

(1) Residence address(es) Yes ☐ No ☐(2) Citizenship Yes ☐ No ☐(3) Occupation Yes ☐ No ☐

(b) If an organization:

(1) Name Yes ☐ No ☒(2) Ownership or control Yes ☐ No ☒(3) Branch offices Yes ☐ No ☒

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

**IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).**3. If you have previously filed Exhibit C<sup>1</sup>, state whether any changes therein have occurred during this 6 month reporting period.Yes ☐No ☐N/AIf yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>1</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

Formerly CRM-154

FORM NSD-2  
Revised 03/11

## 4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Position	Date Connection Ended
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See Attachment
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## (b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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See Attachment
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## 5. (a) Has any person named in Item 4(b) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

Name	Residence Address	Citizenship	Position	Date Assumed
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(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
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(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
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## 6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes ☐ No ☐

If no, list names of persons who have not filed the required statement.

N/A
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**II - FOREIGN PRINCIPAL**

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☒ No ☐  
If yes, furnish the following information:

Foreign Principal

Date of Termination

Sheikh Khalid Bin Saqr Al Qasimi

11/30/2012

8. Have you acquired any new foreign principal(s)<sup>2</sup> during this 6 month reporting period? Yes ☐ No ☒  
If yes, furnish the following information:

Name and Address of Foreign Principal(s)

Date Acquired

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)<sup>2</sup> whom you continued to represent during the 6 month reporting period.

Gazprom Export

Hong Kong Trade Development Council

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A<sup>3</sup> Yes ☐ No ☐Exhibit B<sup>4</sup> Yes ☐ No ☐

N/A

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

<sup>2</sup> The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

<sup>3</sup> The Exhibit A, which is filed on Form NSD-3 (Formerly CRM-157) sets forth the information required to be disclosed concerning each foreign principal.

<sup>4</sup> The Exhibit B, which is filed on Form NSD-4 (Formerly CRM-155) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

**III - ACTIVITIES**

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail your activities and services:

See Attachment

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>5</sup> as defined below? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See Attachment

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

<sup>5</sup> The term "political activity" means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

## IV - FINANCIAL INFORMATION

## 14. (a) RECEIPTS-MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>6</sup>

Date	From Whom	Purpose	Amount
See Attachment			

Total

## (b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, have you received, as part of a fundraising campaign<sup>7</sup>, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

If yes, have you filed an Exhibit D to your registration? Yes ☐ No ☐

If yes, indicate the date the Exhibit D was filed. Date \_\_\_\_\_

## (c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value<sup>9</sup> other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose
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6, 7 A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

8 An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

9 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

**15. (a) DISBURSEMENTS-MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☐ No ☒

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

No expenditures were incurred by the firm on behalf of its foreign principals for this time period.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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Total

(PAGE 7)

**(b) DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, have you disposed of anything of value<sup>10</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐No ☒

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>11</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒No ☐

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
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See Attachment

<sup>10, 11</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks" and the like.

**V - INFORMATIONAL MATERIALS**

16. (a) During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials?<sup>12</sup>  
 Yes ☐ No ☒

If Yes, go to Item 17.

- (b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?

Yes ☐ No ☒

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☐

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

N/A

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- ☐ Radio or TV broadcasts      ☐ Magazine or newspaper      ☐ Motion picture films      ☐ Letters or telegrams  
☐ Advertising campaigns      ☐ Press releases      ☐ Pamphlets or other publications      ☐ Lectures or speeches  
☐ Other (specify) \_\_\_\_\_

**Electronic Communications**

- ☐ Email  
☐ Website URL(s): \_\_\_\_\_  
☐ Social media websites URL(s): \_\_\_\_\_  
☐ Other (specify) \_\_\_\_\_

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

- ☐ Public officials      ☐ Newspapers      ☐ Libraries  
☐ Legislators      ☐ Editors      ☐ Educational institutions  
☐ Government agencies      ☐ Civic groups or associations      ☐ Nationality groups  
☐ Other (specify) \_\_\_\_\_

21. What language was used in the informational materials:

- ☐ English      ☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☐ No ☐

12 The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.



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**VI - EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

11/30/2012(Print or type name under each signature or provide electronic signature<sup>13</sup>)W.R. Nurdwind  
WILLIAM R. NURDWIND

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<sup>13</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

**Venable LLP (Registration No. 5931)**  
**Supplemental Statement for Six Month Period Ending 10/31/2012**

Response to 4(a)

Venable has over 250 partners. From time to time, partners or similar officials join or leave the firm. Those associated with the representation of foreign principals are noted in this report (if applicable).

Response to 4(b)

Venable has over 250 partners. From time to time, partners or similar officials join or leave the firm. Those associated with the representation of foreign principals are noted in this report (if applicable).

Response to 11

Ray Shepherd, III, Partner – Provided research and consultancy services to the Hong Kong Trade Development Council (“HKTDC”).

Thomas Quinn, Partner – Did not engage in activities during this reporting period.

William Nordwind, Partner – Did not engage in activities during this reporting period.

Bart Stupak - Provided research and consultancy services to the HKTDC.

Richard Hegg, Sr. Legislative Advisor – Did not engage in activities during this reporting period.

Robert L. Smith, II, Sr. Legislative Advisor – Did not engage in activities during this reporting period.

Birch Bayh, Partner – Did not engage in activities during this reporting period.

**Venable LLP (Registration No. 5931)**  
**Supplemental Statement for Six Month Period Ending 10/31/2012**

Response to 12

Foreign Principal:  
 Hong Kong Trade Development Council

Short Form Registrant:  
 Raymond Shepherd III

<b>Date</b>	<b>Contact Name</b>	<b>Position</b>	<b>Type of Contact (email, phone, Meeting)</b>	<b>Subject Matter</b>
5/10/12	Stephen Caldwell	Director, Homeland Security and Justice Issues, Government Accountability Office	Teleconference	Port Security Issues
5/10/12	Jason Yanussi of Senator Lieberman's office	Sr. Professional Staff Member Senate Comm. On Homeland Security & Gov't Affairs	Email	Port Security Issues
6/13/12	Jason Yanussi of Senator Lieberman's office	Sr. Professional Staff Member Senate Comm. On Homeland Security & Gov't Affairs	Email	Port Security Issues
6/13/12	Mandy Bowers of Rep. King's office	Sr. Policy Director, House Committee On Homeland Security	Email	Port Security Issues
6/14/12	Jason Yanussi of Senator Lieberman's office	Sr. Professional Staff Member Senate Comm. On Homeland Security & Gov't Affairs	Teleconference	Port Security Issues
7/16/12	Paul Anstine	Staff Director, House Committee on Homeland Security	Email Teleconference	Port Security Issues

**Venable LLP (Registration No. 5931)**  
**Supplemental Statement for Six Month Period Ending 10/31/2012**

Foreign Principal:  
HKTDC

Short Form Registrant:  
Bart Stupak

<b>Date</b>	<b>Contact Name</b>	<b>Position</b>	<b>Type of Contact (email, phone, meeting)</b>	<b>Subject matter</b>
5/18/12	Matt McCarthy	Sen. Cantwell Scheduler	Email and phone calls	Meeting requests and follow-up calls with Senate and House members
5/21/12	Rosanne Harolon	Sen. Reed Scheduler	Emails	Respond to schedules re meeting opportunities
5/24/12	Senator Stabenow and Senator Reed's staff	Senate staffer	Phone call	Call to Congressman Matheson
5/25/12	Alison Inderfurth	Chief of Operations, Rep. Perlmutter's office	Phone call	Meeting request
5/29/12	Christopher Gorud	Rep. Maloney's staff	Email & phone call	Meeting request
5/29/12	Macey Matthews	Rep. Matheson's staff	Email & phone call	Meeting request
5/30/12	Rosanne Harolon	Sen. Reed's office	Calls	Meeting request
5/30/12	Christopher Gorud	Rep. Maloney's staff	Calls	Meeting request
6/1/12	Alison Inderfurth	Scheduler for Rep. Perlmutter	Email	Finalize appointment for Mr. Tong's visit.
6/5/12	Robert Primus	Rep. Capauno Chief of Staff	Phone call	Re-affirm and change meeting times for Commissioner Tong's scheduled on June 7

**Venable LLP (Registration No. 5931)**  
**Supplemental Statement for Six Month Period Ending 10/31/2012**

<b>Date</b>	<b>Contact Name</b>	<b>Position</b>	<b>Type of Contact (email, phone, meeting)</b>	<b>Subject matter</b>
6/13/12	Sen. Reed	Senator	Meeting	Meet with Senator Reed to discuss issues pertaining to Hong Kong
6/29/12	Sen. Stabenow	Senator	Call	Call and finalize appointment for Comm. Tong with Senator Stabenow
7/10/12	Rep. Maloney and Sen. Stabenow	Representation and Senator	Meeting	Meetings with Rep. Maloney and Sen. Stabenow

Response to 14(a)

The following information relates to activities that are non-registrable, as well as activities that are registrable. The substantial majority of payments received were for charges related to services and activities that do not require registration under the Foreign Agents Registration Act of 1938, as amended. Further, some of the payments may relate to services performed in a prior period.

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
5/8/12	HKTDC	Payment for Consulting	\$19,975
7/5/12	HKTDC	Payment for Consulting	\$39,975
8/1/12	HKTDC	Payment for Consulting	\$19,975
9/24/12	HKTDC	Payment for Consulting	\$19,975
10/15/12	HKTDC	Payment for Consulting	\$19,975

Total: \$119,875

<u>Date</u>	<u>From Whom</u>	<u>Purpose</u>	<u>Amount</u>
5/31/12	Gazprom	Payment for Consulting	\$56,000
7/5/12	Gazprom	Payment for Consulting	\$28,000
8/1/12	Gazprom	Payment for Consulting	\$28,000
9/4/12	Gazprom	Payment for Consulting	\$28,000
10/4/12	Gazprom	Payment for Consulting	\$18,000

Total: \$158,000

No payments received from Sheikh Khalid Bin Saqr Al Qasimi

**Venable LLP (Registration No. 5931)**  
**Supplemental Statement for Six Month Period Ending 10/31/2012**

Response to 15(c)

Individuals who have filed Short-Form Registration Statements in connection with Venable LLP's registration under the Foreign Agents Registration Act made the following political contributions during the reporting period:

<b>Date</b>	<b>Amount</b>	<b>Political Organization</b>	<b>Candidate</b>
5/8/12	\$125.00	Ted Cruz for U.S. Senate	Ted Cruz
5/21/2012	\$500	Ben Cardin for Senate	Ben Cardin
5/29/2012	\$1000	Jon Tester for Senate	Jon Tester
6/11/2012	\$500	Angus King for Senate	Angus King
6/19/2012	\$250	Doherty for Congress	Brendan Doherty
6/19/2012	\$500	Hudson for Congress	Richard Hudson
6/27/2012	\$1000	Stabenow for Senate	Debbie Stabenow
7/10/2012	\$1,000	Vern Buchanan for Congress	Vern Buchanan
7/14/2012	\$1000	Donnelly for Senate	Joe Donnelly
7/18/12	\$500.00	National Republican Congressional Committee	
07/20/2012	\$500.00	National Republican Congressional Committee	
7/28/2012	\$2000	Narragansett Bay PAC	Jack Reed
8/21/2012	\$100	NRSC	National Republican Senatorial Committee
9/10/2012	\$1000	Kaine for Senate	Tim Kaine
9/12/2012	\$500	Chris Murphy for Senate	Chris Murphy
9/19/2012	\$500	Manchin for Senate	Joe Manchin
9/20/2012	\$500	Jim Langevin	Jim Langevin
10/4/2012	\$500	Martin Heinrich for Senate	Martin Heinrich
10/4/2012	\$500	Mazie Hirono	Mazie Hirono
10/17/2012	\$500	Steve Danon for County Supervisor '12	Steve Danon
10/17/2012	\$500	Opportunity Virginia PAC	
10/17/2012	\$500	Opportunity Virginia PAC	